

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.
COUNSELLORS AT LAW

JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

CHARLES C. CARELLA
1933 – 2023

DONALD F. MICELI
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD
BRIAN H. FENLON
CAROLINE F. BARTLETT
ZACHARY S. BOWER+
DONALD A. ECKLUND
CHRISTOPHER H. WESTRICK*
STEPHEN R. DANER
MICHAEL A. INNES
MEGAN A. NATALE
KEVIN G. COOPER

**5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com**

PETER G. STEWART
FRANCIS C. HAND
JAMES A. O'BRIEN, III
JOHN G. ESMERADO
STEVEN G. TYSON
MATTHEW J. CERES
ZACHARY A. JACOBS***
JASON H. ALPERSTEIN

OF COUNSEL

*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
***MEMBER IL BAR ONLY
+MEMBER FL BAR ONLY

RAYMOND J. LILLIE
GREGORY G. MAROTTA
MARYSSA P. GEIST
JORDAN M. STEELE
ROBERT J. VASQUEZ
BRITTNEY M. MASTRANGELO
GRANT Y. LEE***
MAYBOL HALL
WILLIAM J. MANORY

June 13, 2025

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *In re Fragrance Direct Purchaser Antitrust Litig.*,
Civil Action Nos. 23-02174, 23-03249, 23-16127

Dear Judge Allen:

Direct Purchaser, Indirect, and End-User Plaintiffs in the above-referenced matters (“Plaintiffs”) write jointly with Defendants pursuant to Your Honor’s May 30, 2025 Letter Order to update the Court on the status of the parties’ efforts to resolve jurisdictional discovery disputes in advance of the status conference scheduled for June 17, 2025.

The parties have continued to meet and confer and have exchanged letters formalizing their areas of agreement and crystalizing certain disagreements for further discussion. Based on those discussions, and the progress that has been made, the parties submit that additional time is needed to complete their meet and confers prior to any Court intervention so that the parties can continue their efforts towards resolving their remaining disputes. Accordingly, the parties propose rescheduling the status conference currently scheduled for June 17, 2025 to a later date. The parties also propose updating the Court by letter on or before July 15, 2025, and, to the extent that the

June 13, 2025

Page 2

parties are at impasse at that time, request that the Court then enter a briefing schedule to resolve any such disputes. If this proposal meets with the Court's approval, please kindly endorse this letter and return it to the parties through the Court's ECF system.

Based on the negotiations between the parties to date, the parties also anticipate that the schedule currently in place for jurisdictional discovery under the Court's Order dated March 26, 2025 may need to be modified. In advance of the rescheduled status conference, the parties will submit a letter to the Court with a proposal for a new schedule.

We thank Your Honor for your continued attention to these matters and we are available at the Court's convenience to answer any questions.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All counsel of record (ECF)